

# Use of Pyrethrins/Permethrins with Air Space Spray Systems in Horse Stables

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**Enclosure to**

Enforcement Letter ENF 03-13

**Distribution**

County Agricultural Commissioners

**Referrals**

If you have any questions, please contact your Senior Pesticide Use Specialist Liaison.

**Pyrethrin/  
permethrin  
label  
interpretations**

The Enforcement Branch recently received a public inquiry regarding the use of pyrethrin/permethrins with air space spray systems.

This document provides label interpretations for the following insecticide products and their use with air space spray systems:

1. Prentox Perm-X 1E: EPA No. 655-783-AA
2. Pyronyl Crop Spray: EPA No. 655-489-ZA
3. Pyronal 303 Emulsifiable Concentrate: EPA No. 655-797-AA

**Air space spray  
systems**

This type of delivery system consists of a holding tank connected to nylon tubing with nozzles at equidistant locations along the tubing strip. The tubing strip is attached to a ceiling or ledge, and is operated with a timer. The nozzles emit a spray mist at timed intervals set by the operator.

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# Prentox Perm-X™ 1E

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**Conflict with labeling**

Conflict with labeling means:  
*“Any deviation from instructions, requirements or prohibitions of pesticide product labeling concerning storage, handling or use except: employing a method of application not expressly prohibited, provided other directions are followed.”*

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**Current labeling**

Labeling under “Directions for Use” allows for use of this product in non-food areas indoors and outside premises of horse stables. However, use of Prentox Perm-X™ 1E EPA Registration No. 655-783-AA via automatic space spray systems in horse stables is not an acceptable method under normal conditions. Title 3 of the California Code of Regulations (3CCR) section 6000 (e) relative to “Conflict with labeling” allows the use of a pesticide by methods not prohibited by the label only if all other label directions are followed.

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**Product use violation**

Use of this product through automatic space spray systems in horse stables sets up a conflict with labeling directions under “Pest Indoors” which state: “Close off all doors and windows. Fill the room with mist, then leave the area. Keep the room closed for at least 15 minutes. Ventilate the room when treatment is completed.”

These label requirements cannot be met on a continuous basis in a structure used for holding and maintaining livestock using a timed release system. The use of this product through automatic space spray systems would constitute a violation of the Food and Agricultural Code (FAC) section 12973, use in conflict with labeling, if the above labeling requirements are not followed.

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## Pyronyl™ Crop Spray

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**Current labeling**

As with the first product, the Pyronyl™ Crop Spray EPA Registration No. 655-489-2A labeling has similar issues with regard to 3CCR section 6000 (e) and FAC section 12973 relative to conflict with labeling.

Labeling under “In Barns, Milking Parlors, Milk Rooms, Dairies and Poultry Houses” states, “The applicator must vacate the treated area after treatment and ventilate before reoccupying.”

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**Product use violation**

Again, this label requirement can not be met on a continuous basis with a timed release system in a structure used for holding and maintaining livestock. This would constitute a violation of FAC section 12973.

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## Pyronyl™ 303 Emulsifiable Concentrate

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### **Alternate chemical**

Pyronyl™ 303 Emulsifiable Concentrate, EPA Registration No. 655-797-AA, has labeling for use through automatic spraying systems. Its labeling states, “Automatic spraying systems must not be programmed to release pesticides where food or feed is directly exposed. To Kill House Flies, Horn Flies, Stable Flies, Mosquitoes and Gnats: Add concentrate to tank and add water to obtain desired dilution. Agitate well while adding water. Dispense diluted concentrate through automatic spraying system. Set nozzles to deliver one (1) ounce liquid per minute. Locate nozzles to cover a maximum of 2,000 cubic feet of space per nozzle. Set timer to operate in accordance with equipment directions.”

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